

**SEALED**

**United States District Court**

NORTHERN

DISTRICT OF

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
**FILED**  
TEXAS  
APR 14 2014  
CLERK, U.S. DISTRICT COURT  
by A Deputy

UNITED STATES OF AMERICA

V.

**COMPLAINT**

CASE NUMBER: 3-14-MJ- 213-BK

ELIEZAR ALEMAN (1), a.k.a. "Eli," a.k.a. "Cocho"  
JUAN CARLOS LNU (2), a.k.a. "Scooby,"  
JOSE LUIS ADAME (3), a.k.a. "Junior"  
JOSE HURTADO ADAME (4), a.k.a. "Jefe"  
JOSE CABRERA-VALENCIA (5), a.k.a. "Che"  
ANTONIO PACHECO (6), a.k.a. "Ronchas"

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Beginning on or about 10/2012 to PRESENT in the Dallas Division of the Northern District of Texas, defendant(s) did,

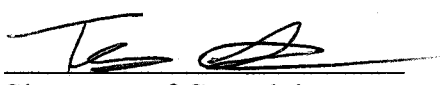
knowingly and intentionally combine, conspire and agree with each other and other known and unknown persons, to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine,

in violation of Title 21, United States Code, Section(s) 846, 841(a)(1) and (b)(1)(A).

I further state that I am a(n) Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA) and that this complaint is based on the following facts:

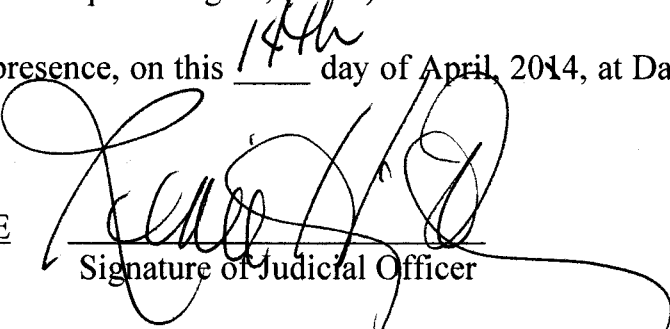
See attached Affidavit of Special Agent Travis Schulze, (DEA) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No

  
Signature of Complainant  
TRAVIS SCHULZE  
Special Agent, (DEA)

Sworn to before me and subscribed in my presence, on this 14th day of April, 2014, at Dallas, Texas.

RENÉE HARRIS TOLIVER  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

AFFIDAVIT

I, Travis Schulze, after being duly sworn, depose and say as follows:

**I. Introduction**

My name is Travis Schulze, and I am a Special Agent with the United States Department of Justice Drug Enforcement Administration (DEA). I have been so employed for approximately two years. I am assigned to the Dallas Field Division Office to investigate violations of federal drug statutes. I have investigated and participated in previous investigations of violations of 21 U.S.C. §§ 841(a)(1), and 846.

**II. Probable Cause**

1. I have probable cause to believe that
  - a. **Eliezar Aleman, a.k.a. "Eli," a.k.a. "Cocho,"**
  - b. **Juan Carlos LNU, a.k.a "Scooby,"**
  - c. **Jose Luis Adame, a.k.a. "Junior,"**
  - d. **Jose Hurtado Adame, a.k.a "Jefe,"**
  - e. **Jose Cabrera-Valencia, a.k.a. "Che," and,**
  - f. **Antonio Pacheco, a.k.a. "Ronchas,"**

have violated 21 U.S.C. §§ 846, 841 (a)(1) and (b)(1)(A), that is, conspiracy to possess with the intent to distribute 500 grams or more of a mixture and substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. The following information is based on my own observations, information received from other DEA agents, information received from a reliable Confidential Source (CS), information received from reliable and credible Cooperating Defendants (CD), and information provided to me by other law enforcement officers involved in the investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me and other investigators. Rather, I am submitting only the facts necessary to establish probable cause that each defendant knowingly and intentionally conspired to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

### **Background**

3. In May 2012, Drug Enforcement Administration (DEA) agents of the Dallas Field Division initiated an investigation targeting members of the Caballeros Tempalarios and Guadalajara Cartel operating in the Dallas, Texas area. Both cartels supply methamphetamine to groups based in the Dallas, Texas area. Agents and other law enforcement officers identified Eliezar Aleman (a.k.a. "Eli" and "Cocho") and Jose Cabrera-Valencia (a.k.a. "Che") as leader/organizers of two methamphetamine distribution groups operating in the Dallas, Texas area. Both

Aleman and Cabrera-Valencia are supplied by a common source in Mexico.

Aleman employs a subject known only as "Scooby" as his methamphetamine distributor, drug proceeds collector, and methamphetamine conversion cook.

Aleman and "Scooby" utilize "trap" vehicles to import and distribute methamphetamine. Aleman and "Scooby's" customers include Jose Luis Adame, a.k.a. "Junior," and Jose Hurtado Adame, a.k.a. "Jefe." Jose Cabrera-Valencia, a.k.a. "Che," is the leader/organizer of a Dallas-based methamphetamine trafficking group that receives its methamphetamine from the same source as the Aleman group. Valencia employs Antonio Pacheco, a.k.a. "Ronchas," as his methamphetamine distributor and drug proceeds collector.

#### **Aleman Group**

4. After initiating this investigation, agents cultivated a reliable and credible Cooperating Defendant (CD #1) who outlined Aleman's drug trafficking activities. The CD #1 indicated that the methamphetamine enters the United States from Mexico hidden in secret or "trap" compartment in vehicles. These vehicles enter the country through the Laredo, Texas, port of entry. The methamphetamine is transported in liquid and/or powder form, and once it reaches the Dallas, Texas, area, Juan Carlos LNU, a.k.a. "Scooby" receives the vehicle and removes the methamphetamine into large buckets. "Scooby" then converts or "cooks" the methamphetamine into a crystallized form for distribution. "Scooby" maintains the

methamphetamine stash house, and at Aleman's direction, distributes the methamphetamine to customers in the Dallas area and collects drug proceeds generated by methamphetamine sales. Aleman frequently visits, for short periods of time, the methamphetamine stash house that "Scooby" maintains to collect the drug proceeds.

5. The CD #1 advised that Aleman keeps an accounting of the drug proceeds he collects, and then packages the money to send to associates in Mexico. The CD #1 described two methods Aleman uses to transport drug proceeds: (1) Aleman employs drivers to drive vehicles to Mexico with the drug proceeds hidden in compartments in the vehicles, or (2) Aleman recruits individuals to "body carry" the proceeds into Mexico by traveling on commercial buses. The CD #1 stated that, on approximately 60 occasions between 2006 and 2010, he/she body-carried currency for Aleman. Each time, the CD #1 body carried approximately \$140,000 to \$200,000.

6. In November 2012, CD #1 informed agents that Aleman planned to transport drug proceed from Dallas, Texas, to a Mexico-based associate using a female body-carrier via a commercial bus. CD #1 provided agents with the female transporter's identity and bus ticket information including the bus departure and arrival time. On November 2, 2012, based on CD #1's information, agents established surveillance at the female transporter's residence. During surveillance,

agents observed a Volkswagen GTS arrive at the residence. This vehicle was identified by CD #1 as Aleman's vehicle. At the same time, CD #1 contacted agents and advised that "Eli"(Aleman) had arrived at the female transporter's residence with three green, rectangular packages containing drug proceeds destined for Mexico. Surveillance followed Aleman's vehicle to a bus station in Dallas, Texas, and observed Aleman and the female transporter purchase a bus ticket. The female transporter boarded the bus headed to Mexico. The bus departed and a short distance from the station, agents stopped the bus, boarded it, and searched the female transporter. The search resulted in the seizure of \$59,900. The female transporter stated she was directed to deliver the currency to an unidentified individual once she arrived in Mexico. Agents also followed Aleman from the bus station, and he drove to 2830 Michigan Avenue, Dallas, Texas. Based on source information and surveillance, Aleman is responsible for collecting and transporting drug proceeds and utilizes 2830 Michigan Avenue to store drug proceeds.

7. On December 12, 2012, CD #2 was stopped at the border attempting to enter the United States with approximately nine kilograms of methamphetamine. CD #2 cooperated at his/her arrest and said that the methamphetamine was intended to be delivered to Eliezar Aleman in Dallas. CD #2 also said that he/she

had made approximately five to six previous trips to Mexico for Aleman, transporting currency to Mexico, and returning with methamphetamine.

8. On December 30, 2012, CD #3 was stopped at the border attempting to enter the United States with approximately 40 kilograms of methamphetamine. CD #3 cooperated and said that the methamphetamine was destined for Aleman in Dallas, Texas.

### **Drug Purchases from Aleman's Group**

9. On January 27, 2014, FBI agents from the Plano, Texas office and the Denton Police Department officers utilized CS #2 to conduct an undercover methamphetamine purchase from Jose Luis Adame, a.k.a. "Junior," and Jose Hurtado Adame, a.k.a. "Jefe." During this investigation, Luis Adame and Hurtado Adame were identified as multi-pound methamphetamine distributors in the Denton, Texas area. Before the planned methamphetamine transaction, agents and law enforcement personnel consensually recorded a series of calls between CS #2 and Luis Adame regarding the purchase of approximately four ounces of methamphetamine. Luis Adame told CS #2 that they would first meet so that CS #2 could pay for the methamphetamine. Then Hurtado Adame and Luis Adame would leave to go obtain the methamphetamine and would return to deliver the methamphetamine to CS #2.

10. Surveillance observed CS #2 meet with Luis Adame and Hurtado Adame in Lewisville, Texas. CS #2 gave the Adames the money for the methamphetamine and the Adames left to get the methamphetamine. Officers followed the Adames' vehicle to a Walgreens' parking lot in Dallas. Hurtado Adame exited his vehicle and entered the vehicle of an individual later identified as "Scooby." After a short time, Hurtado Adame exited "Scooby's" vehicle, returned to his vehicle where Luis Adame was waiting. Surveillance split into two units to follow both the Adames and "Scooby." Surveillance followed the Adames back to Lewisville, Texas, where they observed Luis Adame meet with CS #2. Luis Adame delivered the methamphetamine to CS #2. The other surveillance unit followed "Scooby" to 629 Chapman Drive, Lancaster, Texas. DEA identified this location as the methamphetamine stash house "Scooby" maintains for Aleman.

11. On March 20, 2014, DEA and FBI Plano conducted a joint surveillance operation utilizing CS #2 to purchase approximately eight ounces of methamphetamine from Luis Adame. That day, agents and law enforcement personnel consensually recorded a phone call between CS #2 and Luis Adame regarding the methamphetamine transaction. Adame and CS #2 agreed to conduct this transaction in the same manner as the previous transaction – CS #2 would provide the money to Adame who would leave to go purchase the methamphetamine and then Adame would return with the methamphetamine to



deliver to CS #2. FBI surveillance observed CS #2 meet with Luis Adame in Lewisville, Texas. Officers then followed Luis Adame to a business parking lot in Dallas, Texas. At the same time, DEA agents established surveillance at 629 Chapman Drive, Lancaster, Texas. Agents observed "Scooby" leave 629 Chapman and drive to the business parking lot to meet with Luis Adame. Surveillance observed Luis Adame enter "Scooby's" vehicle. After a short time, Luis Adame exited "Scooby's" vehicle with a white plastic bag. FBI surveillance followed Luis Adame back to Lewisville, Texas, where he delivered a white plastic bag containing approximately eight ounces of methamphetamine to CS #2. From the Dallas business parking lot, surveillance followed "Scooby" back to 629 Chapman Drive, Lancaster, Texas.

12. Since identifying 629 Chapman Drive, Lancaster, Texas, as the stash house/conversion lab in February 2014, surveillance has routinely observed Aleman and "Scooby" at the residence. "Scooby" is believed to reside at the location. Surveillance routinely observes Aleman arrive at 629 Chapman Drive only to depart a short a time later. After departing, Aleman consistently travels to the 2830 Michigan Avenue, Dallas, Texas, (this is the location where Aleman returned to after taking the female who was body-carrying currency to the bus station). For example, from March 27, 2014, to April 4, 2014, surveillance was conducted on both 629 Chapman Drive (the methamphetamine stash house) and

the 2830 Michigan Avenue, Dallas, Texas. During this week, surveillance observed Aleman's silver 2004 Toyota Tundra at both locations.

- March 27, 2014 - Observed at 629 Chapman Drive from 9:02 a.m. to 10:56 a.m. Observed at 2830 Michigan Avenue at 12:23 p.m.
- March 28, 2014 - Observed at 629 Chapman Drive from 9:14 a.m. to 11:30 a.m. Observed at 2830 Michigan Avenue at 11:45 p.m.
- March 29, 2014 - Observed at 629 Chapman Drive from 9:31 a.m. to 10:46 a.m. Observed at 2830 Michigan Avenue at 11:00 p.m.
- April 1, 2014 - Observed at 629 Chapman Drive from 9:06 a.m. to 11:57 a.m. Returned to 629 Chapman Drive from 12:22 p.m. to 1:56 p.m. Observed at 2830 Michigan Avenue at 2:13 p.m.
- April 3, 2014 - Observed at 629 Chapman Drive from 9:09 a.m. to 9:50 a.m. Observed at 2830 Michigan Avenue at 10:56 p.m.
- April 4, 2014 - Observed at 629 Chapman Drive from 10:27 a.m. to 11:10 a.m. Observed at 2830 Michigan Avenue at 12:48 p.m.

13. Surveillance of Aleman at both locations corroborates the CD's information about Aleman's role in the organization. Aleman was identified as the drug proceeds accountant responsible for collecting proceeds from distributors like "Scooby." Aleman then arranges to transport the drug proceeds to associates in Mexico.

### **Drug Purchases from Valencia and Pacheco**

14. In October 2012, a reliable and credible Cooperating Defendant (CD #1) identified Jose Cabrera-Valencia, a.k.a. "Che" and Antonio Pacheco, a.k.a. "Ronchas," as a part of a multi-kilogram methamphetamine trafficking organization in the Dallas, Texas, area and elsewhere. Agents began investigating and identified Valencia as the cell-head leader and Antonio Pacheco, a.k.a. "Ronchas" as Valencia's courier and conversion cook.

15. On February 22, 2013, DEA Dallas agents utilized CS #1 to arrange the purchase of one-half pound of methamphetamine from Antonio Pacheco, a.k.a. "Ronchas." During the operation, surveillance observed CS #1 meet with Pacheco who acted as a "middleman" or broker for the transaction. Pacheco accompanied CS #1 to a business in Dallas where they met Valencia. Valencia and the CS #1 negotiated a price of \$6,400.00 for the one-half pound of methamphetamine. Valencia informed CS #1 that he could supply CS #1 with any amount of methamphetamine in the future, and that he always maintained at least 10 pounds concealed in a "laboratory" in Dallas. Valencia directed CS#1 to wait for his (Valencia's) courier to deliver the product. After several minutes, a subject later identified as FNU LNU, a.k.a. "Chuy," arrived at the business and delivered one-half pound of methamphetamine to CS#1. CS #1 paid "Chuy" \$6,000.00 for the methamphetamine and gave \$400.00 to Pacheco for brokering the transaction.

16. In December 2013, DEA Dallas agents directed CS #1 to arrange the purchase of methamphetamine from Valencia. Under agents' supervision, CS #1 conducted a series of recorded phone calls to Valencia and negotiated the purchase of one-half pound of methamphetamine. Valencia instructed CS #1 to meet with "Chuy" at the same location as the last transaction. On December 12, 2013, agents surveilled the meeting between CS #1 and "Chuy" at the location instructed by Valencia. During the operation, "Chuy" delivered the methamphetamine to CS #1 and instructed CS #1 to pay Valencia's associate not named in this affidavit. CS #1 paid Valencia's associate \$4,400.00. Later that day, agents directed CS #1 to place a recorded phone call to Valencia. During the phone call CS #1 confirmed that he/she had received the methamphetamine and paid Valencia's associate. A chemical analysis of the purchase substance was later confirmed to be methamphetamine.

17. On March 13, 2014, Dallas DEA agents established surveillance at 1325 Prater Street in Dallas, Texas. Agents identified this as Antonio Pacheco's residence. CS #1 informed agents that Pacheco was expecting a shipment of liquid methamphetamine and would begin to convert it into crystal methamphetamine. Agents observed Pacheco leave the residence and drive to a nearby Walmart where he purchased supplies used to convert liquid methamphetamine into crystal methamphetamine. Agents observed Pacheco purchase four one-half gallon

beverage coolers. Agents know that methamphetamine cooks use the coolers to measure the liquid methamphetamine. A half-gallon converts into five pounds of crystal methamphetamine. Agents have encountered these coolers in numerous other methamphetamine conversion laboratories.

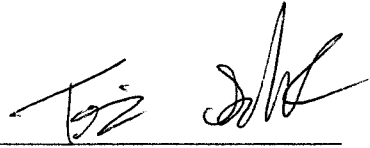
**Incoming Shipment to both Aleman and Cabrera-Valencia Groups**

18. On March 31, 2014, CS #1 contacted agents and related that he/she had recently been at Pacheco's home, and overheard Pacheco and Cabrera-Valencia discussing that a load was coming from the Mexican source of supply. Pacheco and Cabrera-Valencia indicated that they would be sharing or splitting the incoming methamphetamine load with "Eli," or Eliezar Aleman and his associates.

**III. CONCLUSION**

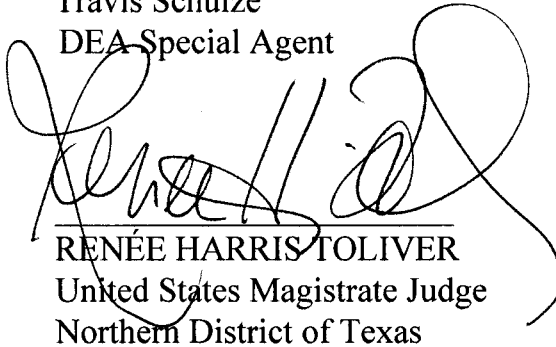
19. Based upon the information contained in this affidavit, I believe that there is probable cause to believe **Eliezar Aleman, a.k.a. "Eli," a.k.a. "Cocho," Juan Carlos LNU, a.k.a "Scooby," Jose Luis Adame, a.k.a. "Junior," Jose Hurtado Adame, a.k.a "Jefe," Jose Cabrera-Valencia, a.k.a. "Che," and Antonio Pacheco, a.k.a. "Ronchas,"** have violated 21 U.S.C. §§ 846, 841 (a)(1) and (b)(1)(A), that is conspiracy to possess with the intent to distribute 500 grams or

more of a mixture and substance containing a detectable amount of  
methamphetamine.



Travis Schulze  
DEA Special Agent

Sworn to before me on April <sup>14</sup>~~9~~, 2014.



RENÉE HARRIS TOLIVER  
United States Magistrate Judge  
Northern District of Texas